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5
6 Alan J. Friedman (CA State Bar #132580)
(*pro hac vice* pending)
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10
11 Attorneys for ICAP DIP Finance Group LLC

12
13 **UNITED STATES BANKRUPTCY COURT**
14 **EASTERN DISTRICT OF WASHINGTON**

15 In re: Chapter 11
16 Lead Case No. 23-01243-WLH11
17 ICAP ENTERPRISES, INC., et al., Jointly Administered

18 Debtors.

**MOTION OF ICAP DIP FINANCE
GROUP LLC FOR ADMISSION
PRO HAC VICE OF ALAN J.
FRIEDMAN**

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22 Pursuant to Rule 83.2(c) of the Local Rules for the District Court for the
23 Eastern District of Washington (the “Local District Court Rules”), and Rule 9010-
24 1(a)(3) of the Local Rules for the Bankruptcy Court for the Eastern District of
25 Washington (the “Local Bankruptcy Court Rules”), Metiner G. Kimel of the law
26 firm of Kimel Law Offices, a member in good standing of the Washington State Bar
27 and of the United States District Court for the Eastern District of Washington,
28

1 hereby moves on behalf ICAP DIP Finance Group, LLC, as a party in interest, for
2 the admission *pro hac vice* of Alan J. Friedman in the above-captioned cases
3 (collectively, the “Cases”), based on the following:

4 1. Alan J. Friedman's business address, phone number, and email are as
5 follows:

6 Alan J. Friedman, Esq.
7 Shulman Bastian Friedman & Bui LLP
8 100 Spectrum Center Drive, Suite 600
9 Irvine, CA 92618
10 Telephone: (949) 340-3400
Email: afriedman@shulmanbastian.com

11 2. Mr. Friedman is admitted to practice law in the following states:

- 12 ▪ California: 1987, Bar No. 132580
- 13 ▪ Texas, 2017, Bar No. 24105390

14 3. Mr. Friedman is admitted to practice law in the following courts:

- 15 • U. S. District Court, Central District of California, 1987
- 16 • U.S. District Court, Southern District of California, 1987
- 17 • U.S. Supreme Court, 1997
- 18 • U.S. Court of Appeals Federal Circuit, 2019
- 19 • U.S. Court of Appeals, 9th Circuit, 2021
- 20 • U.S. District Court Northern District of California, 2021

21 4. Name, address, phone number and email of admitted counsel with
22 whom the applicant will be associated (“Admitted Counsel”):

23 Metiner G. Kimel (WSBA #21280)
24 Kimel Law Offices
25 205 North 40th Avenue, Suite 205
26 Yakima, WA 98908
27 Phone: 509-452-1115
mkimel@mkimellaw.com

1 5. Necessity for appearance by Mr. Friedman:
2 Mr. Friedman will be primary counsel for ICAP DIP Finance Group, LLC,
3 the proposed debtor in possession lender in these chapter 11 cases.

4 6. Mr. Friedman has never been subject to any disciplinary sanction by
5 any Court or Bar Association and no such disciplinary or sanction actions are
6 pending against Mr. Friedman.

7 7. Mr. Friedman has read and is familiar with the Local District Court
8 Rules, particularly Local District Court Rule 83.2(c), and understands it is
9 necessary for Admitted Counsel to sign all pleadings, motions and other papers
10 prior to filing and service and Admitted Counsel shall have meaningful
11 participation in the case.

12 8. Pursuant to Local Bankruptcy Court Rule 9010 and Local District
13 Court Rule 83.2 (c), the required fee has been paid.

14 WHEREFORE, it is requested that this Court enter an order admitting
15 Alan J. Friedman to practice law before this Court in the above-captioned
16 cases, and any related cases, adversary proceedings, and appeals, and to serve as co-
17 counsel with Metiner G. Kimel.

18 DATED: March 11, 2024.

19
20 /s/ Metiner G. Kimel
21 Metiner G. Kimel (WSBA #21280)
22 Kimel Law Offices
23 205 North 40th Avenue, Suite 205
 Yakima, WA 98908

24 Alan J. Friedman (CA Bar #132580)
25 Shulman Bastian Friedman & Bui LLP
26 100 Spectrum Center Drive, Suite 600
27 Irvine, CA 92618
28 (*pro hac vice* pending)